



November 20, 2017

Via electronic mail to: mckim.krista@epa.gov

Krista McKim
United States Environmental Protection Agency
77 W. Jackson Boulevard
Chicago, IL 60604

**RE: Confidential Business Information,
Patriot Water Treatment Response to USEPA Section 308 Request**

Ms. McKim,

I am writing in response to Candice Bauer's letter, received by Patriot Water Treatment LLC ("Patriot") October 30, 2017, regarding the treatment of certain information as confidential business information ("CBI"). Patriot submitted information to U.S. EPA in response to an April 26, 2016 request for information under Clean Water Act Section 308, but inadvertently did not specifically identify what information was CBI.

Patriot considers the following information to be CBI, and therefore not appropriate for disclosure in response to a FOIA request:

- Enclosure 3, Response 2.2.6 (Revenues, assets, and employment), Response 5.1.3 (Total Facility Employment), and Responses 5.1.5 (Income Statement), 5.1.6 (Balance Sheet), 5.1.7 (Facility Investments)
- Enclosure 3, Responses 5.2 and 5.3
- Enclosure 5, Response 9 (List chemicals added to units comprising the treatment system(s) and provide the requested information)
- Enclosure 5, Responses 11 and 12 (Equipment, treatment, and maintenance cost information)
- Enclosure 5, Response 14 (Are any improvements to your treatment system(s) planned after 2015?)

Main Office:
7716 Depot Rd, Unit 1
Lisbon, OH 44432
Phone (330) 222-1274
Fax (330) 222-1500

www.patriotwatertreatment.com

Treatment Facility:
2840 Sferra Ave
Warren OH 44483
Phone (330) 399-1151
Fax (330) 399-1242



The reason these responses should be considered CBI is more fully laid out below:

Enclosure 3, Response 2.2.6, Response 5.1.3 and Responses 5.1.5, 5.1.6, and 5.1.7

These Responses include confidential financial information that Patriot, as a privately held company unaffiliated with any publicly-traded company, has not disclosed to anyone other than parties bound by a non-disclosure agreement and U.S. EPA. The information was submitted on a mandatory basis in response to U.S. EPA's Clean Water Act Section 308 authority.

Enclosure 3, Responses 5.2 and 5.3

These Responses include confidential cost and revenue information that Patriot, as a privately held company unaffiliated with any publicly-traded company, has not disclosed to anyone other than parties bound by a non-disclosure agreement and U.S. EPA. The information was submitted on a mandatory basis in response to U.S. EPA's Clean Water Act Section 308 authority.

Enclosure 5, Response 9

This Response includes specific information regarding the types of additives that Patriot uses in its proprietary treatment processes. Allowing the public (and Patriot's competitors) to access this information will put Patriot at a competitive disadvantage. Patriot has not disclosed this information to any party other than government regulators and there no means by which the public would be able to access this information. In addition, Patriot considers this information to be trade secrets exempt from disclosure under FOIA. The information was submitted on a mandatory basis in response to U.S. EPA's Clean Water Act Section 308 authority.

Enclosure 5, Responses 11 and 12

These Responses include specific cost information that These Responses include confidential cost and revenue information that Patriot, as a privately held company unaffiliated with any publicly-traded company, has not disclosed to anyone other U.S. EPA. In addition, allowing the public (and Patriot's competitors) to access this information will put Patriot at a competitive disadvantage. The information was submitted on a mandatory basis in response to U.S. EPA's Clean Water Act Section 308 authority.

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Water Management Solutions. Environmental Responsibility.

Enclosure 5, Response 14

This Response includes specific forward-looking information about the types and costs of improvements that Patriot has made in the recent past or will make in the near future. Allowing the public (and Patriot's competitors) to access this information will put Patriot at a competitive disadvantage, or allow Patriot's competitors to install similar equipment to maintain competitiveness with Patriot. Patriot has not disclosed this information to any party other than U.S. EPA and there no means by which the public would be able to access this information. The information should be kept confidential permanently. The information was submitted on a mandatory basis in response to U.S. EPA's Clean Water Act Section 308 authority.

If you have any questions regarding any of the information contained in this letter or in Patriot's response to the original Section 308 Request, please contact me.

Sincerely,

Andrew Blocksom
President
Patriot Water Treatment

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